
**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

H2E AMERICAS, LLC,

Petitioner,

vs.

RYMARK, INC., *et al.*,

Respondents.

Case 1:25-mc-29-RGA-SRF

**[Originating Case in United States District
Court for the District of Utah]**

Case No.: 2:23-cv-00467

JOINT MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Respondents Rymark, Inc., Vicky Small, and Nicolas Thayne Markosian (“Defendants” or “Rymark”) respectfully move this Court to schedule a teleconference to address the following outstanding discovery dispute: whether Defendant’s subpoena should be quashed, or a protective order entered in response to Petitioner H2E Americas, LLC’s (“Petitioner”) Motion to Quash Non-Party Subpoena or for Protective Order (D.I. 1).

The following attorneys, including at least one Delaware Counsel and at least one Lead Counsel per party, participated in video meet-and-confers by Zoom on Monday February 10, 2025.

Delaware Counsel:

For Defendants: Jesse L. Noa

For Petitioner: Zachary J. Schnapp

Lead Counsel:

For Defendants: Robert Harrington

For Petitioner: David Osborne

The parties are available for a teleconference on the following dates:

- March 11, 2025
- March 12, 2025
- March 13, 2025

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February 24, 2025

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